

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 23-063(1) (KMM/DJF)
	)	
Plaintiff,	)	<b>DEFENDANT'S MOTION TO</b>
v.	)	<b>COMPEL ATTORNEY FOR THE</b>
	)	<b>GOVERNMENT TO DISCLOSE</b>
VATTHANA ANDY	)	<b>EVIDENCE FAVORABLE TO THE</b>
SENGSOURIYA,	)	<b>DEFENDANT</b>
	)	
Defendant.	)	

The defendant, Vatthana Andy Sengsouriya, through his undersigned attorney, Jean M. Brandl, moves the Court, pursuant to the authority of Federal Rule of Criminal Procedure 5(f); *Brady v. Maryland*, 373 U.S. 83 (1963); *Miller v. Pate*, 386 U.S. 1 (1967); *Giles v. Maryland*, 386 U.S. 66 (1967); and *Moore v. Illinois*, 408 U.S. 786 (1972), for an order compelling disclosure of any evidence in the possession of the prosecution or any of its agents, or other evidence the existence of which is known, or by the exercise of due diligence may become known to the prosecution, which may be favorable to the defendant or could reasonably weaken or affect any evidence that may be introduced against the defendant or is otherwise relevant to the subject matter of this case and may in any manner aid Mr. Sengsouriya in the investigation or preparation of his case for trial or sentencing, said disclosure to be made without regard to whether the evidence to be disclosed may be admissible at the trial herein, and to include but not limited to the following:

1. Any statements of any witnesses exculpating the defendant.
2. Any statements of witnesses, which contradict statements of other witnesses.
3. Any reports of interviews with any witnesses.

4. Any prior convictions of prospective government witnesses.
5. Any offers or promises made to prospective government witnesses to induce their cooperation against the defendant whether or not the government intends to call those persons as witnesses.
6. Any witnesses who are known to the Government, but were not interviewed.

Dated: April 20, 2023

Respectfully submitted,

*s/ Jean M. Brandl*

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